



December 14, 2017

CERTIFIED MAIL: 7011 3500 0003 5438 6141

RETURN RECEIPT REQUESTED

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-2-1-10459

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RETURN RECEIPT REQUESTED

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. EPA Headquarters, MC 2242A
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

CERTIFIED MAIL: 7011 3500 0003 5438 6363

RETURN RECEIPT REQUESTED

Chief, Air and TRI Section
Enforcement Division
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Consent Decree No. CV-15-02206-PHX-DLR – October 24, 2017 Notification of Emission Limit Exceedance and Subsequent Re-Test Results

To whom it may concern:

ASARCO LLC (Asarco) notified the Environmental Protection Agency (EPA) and the U.S. Department of Justice (DOJ) on October 24, 2017 of the results of the Reference Method 5 particulate test that was conducted on the R&R Cottrell Electrostatic Precipitator (ESP) on September 19, 2017. Those results were inconsistent with observed performance of the R&R Cottrell ESP during the test and with prior Method 5 sampling at that location. Additionally, due to the high likelihood of sample error at this sampling location as outlined in Asarco's October 24, 2017 notification letter to EPA and

DOJ, Asarco felt it was necessary to schedule a re-test of the RR Cottrell ESP. The repeat performance test was scheduled for the week of November 13, 2017.

The re-test occurred on November 16, 2017 and resulted in an average particulate emissions of 8.688 mg/dscm which is below the Paragraph 19 particulate matter emission limit of 23 mg/dscm. The repeat testing occurred within the 365 days of the Effective Date as provided in Paragraph 16. The results for the re-test are attached.

If there are any questions, please contact Amy Veek at (520) 356-3296.



Joseph A. Wilhelm
General Manager
Hayden Operations

JAW/rcg

pc: S. Gasser
A. Veek
SM Engineer

**Summary of ASARCO LLC - Hayden Smelter
Particulate Emission Data
R & R Cottrell
11/16/17**

		EPA Method 5 Particulates		
Run	Time	gr/dscf	lb/hr	mg/dscm
31-PT	08:30-09:55	0.0043	14.01	9.756
32-PT	10:33-11:56	0.0040	12.04	9.147
33-PT	12:29-13:55	0.0031	9.78	7.161
Mean		0.0038	11.94	8.688

EPA Methods 1-4 Gas Stream Characteristics								
Run	Time	AWCFM	ADCFM	DSCFH	Ts °F	H₂O	CO₂	O₂
						%v	%vd	
31-PT	08:30-09:55	466,554.8	450,225.4	22,800,852.8	120.1	3.50	0.0	20.9
32-PT	10:33-11:56	428,659.8	419,529.3	21,071,947.0	124.9	2.13	0.0	20.9
33-PT	12:29-13:55	448,053.1	441,242.7	22,093,633.1	125.9	1.52	0.0	20.9
Mean		447,755.9	436,999.1	21,988,811.0	123.6	2.38	0.0	20.9